

FILED

KC

MAY 25 2005

IN THE UNITED STATES DISTRICT COURT
MICHAEL W DOBBINS FOR THE NORTHERN DISTRICT OF ILLINOIS
CLERK, U.S. DISTRICT COURT EASTERN DIVISION

DANIEL SCHULZ,

Plaintiff,

v.

OXFORD MANAGEMENT
SERVICES, INC.,

Defendant.

Jury Demanded

05C 3133

JUDGE LEINENWEBER
MAGISTRATE JUDGE MASON

COMPLAINT

INTRODUCTION

1. Plaintiff brings this action to secure redress against unlawful credit and collection practices engaged in by defendant Oxford Management Services, Inc. ("OMS"). Plaintiff alleges violation of the Fair Debt Collection Practices Act, 15 U.S.C. §1692 et seq. ("FDCPA").

JURISDICTION AND VENUE

2. This Court has jurisdiction under 28 U.S.C. §§1331 and 1337, and 15 U.S.C. §1692k (FDCPA).

3. Venue and personal jurisdiction in this District is proper because: a) Defendant transacts business here, and b) Defendant's collection communication to plaintiff was transmitted into the District.

PARTIES

4. Plaintiff Daniel Schulz ("Schulz") is an individual who resides in Aurora, Illinois.

5. Defendant OMS is a corporation with its principal place of business located at 135 Maxess Road, Suite 2B, Melville, NY 11747. Oxford operates a collection agency. It is a debt collector subject to the FDCPA. It does business in Illinois.

FACTS

6. On or about April 22, 2005, OMS sent Exhibit A to plaintiff. Plaintiff

received it a few days later.

7. Defendant has notice that plaintiff is represented by the undersigned attorneys because Mr. Schulz is a plaintiff in Thompson v. Spinelli, Case No. 04 C 8224 (N.D.Ill.) (Darrah, J.). That case was filed December 21, 2004. The complaint is attached as Exhibit B.

VIOLATION ALLEGED

8. The FDCPA makes it illegal for a debt collector to directly contact a person represented by an attorney without the consumer's prior consent:

(a) Communication with the consumer generally

Without the prior consent of the consumer given directly to the debt collector or the express permission of a court of competent jurisdiction, a debt collector may not communicate with a consumer in connection with the collection of any debt—

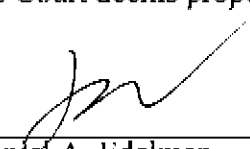
(2) if the debt collector knows the consumer is represented by an attorney with respect to such debt and has knowledge of, or can readily ascertain, such attorney's name and address, unless the attorney fails to respond within a reasonable period of time to a communication from the debt collector or unless the attorney consents to direct communication with the consumer; [15 U.S.C. § 1692c]

9. Because of the previously filed case, which is being vigorously litigated by OMS, OMS knew that plaintiff was represented by Edelman, Combs, Lattuner & Goodwin, LLC, and therefore violated § 1692c(a)(2).

10. Plaintiff has not consented to OMS contacting him directly.

WHEREFORE, plaintiff requests that the Court enter judgment in favor of plaintiff and against defendant for:

- a. Statutory damages;
- b. Attorney's fees, litigation expenses and costs of suit;
- c. Such other or further relief as the Court deems proper.

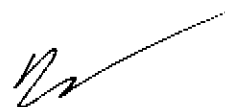


Daniel A. Edelman

Daniel A. Edelman
Cathleen M. Combs
James O. Lattuner
Alexander H. Burke
EDELMAN, COMBS, LATTURNER
& GOODWIN, L.L.C.
120 S. LaSalle Street, 18th Floor
Chicago, Illinois 60603
(312) 739-4200
(312) 419-0379 (FAX)

JURY DEMAND

Plaintiff demands a trial by jury.



Daniel A. Edelman

J:\Case\spinelli-thompson12.750\pleading\Schulz indiv.emplt.wpd

EXHIBIT A

CS 9018
Melville, NY 11747

April 22, 2005

5905102-153
Daniel Schulz
2030 Lilac Lane Apt 4
Aurora, IL 60506

Re: PCDI
Account #: [REDACTED]
Claim #: 5905102
Amount: \$239.51
Settlement Amount: \$239.51
Settlement Due Date: 4/30/05

Dear Daniel Schulz:

Since all previous attempts to resolve the above captioned debt have failed, this firm has been retained by the above named client to assist in the collection of this debt.

Our client has authorized us to accept the balance indicated above as full settlement on your account provided that this payment is received no later than April 30, 2005. This is an opportunity for you to resolve this debt. If this matter has been overlooked, please be aware that it is still legally owed and payment via check, check-by-phone, money order or credit card will cease all collection activity.

In order to ensure proper crediting and handling of your account, payment must be made payable to the above named client and must be remitted to this office. If you have any questions, please do not hesitate to contact this office at 1-800-722-0248.

This letter serves as an attempt to collect a debt, and any information obtained will be used for that purpose. This communication is from a debt collector.

Sincerely,

Oxford Management Services

Oxford Management Services

MasterCard/Visa Credit Card Payment Information

Account Number: [REDACTED]
Expiration Date: [REDACTED] Amount: \$ [REDACTED]
Cardholder Signature: [REDACTED]
Print Name: [REDACTED]

RE: PCDI
Account #: [REDACTED]
Claim #: 5905102
Amount: \$239.51
Settlement Amount: \$239.51
Settlement Due Date: 05/12/05

PCDI
P.O. Box 1584
Melville, NY 11747

A bank fee of \$26.00 will be applied to your account for any dishonored check deposited in accordance with New York State law.

Please see reverse side for collection laws that may apply to your state.



Oxford Management Services™

CS 9018, Melville, NY 11747 1-800-722-0248 Fax: 570-576-6983



PKG1-153
C10153

PAYMENT REMITTANCE INFORMATION

<p>Payments by Mail:</p> <p>Oxford Management Services CS9018 Melville, NY 11747</p>	<p>Overnight Mail:</p> <p>Oxford Management Services 135 Massess Road Suite 2A Melville, NY 11747</p>	<p>Western Union — Quick College</p> <p>Pay to: Oxford Management Services Code City: OMS State: NY</p> <p>To find nearest Western Union agent near you, please call (800) 325-6000 option 2 Melville, NY 11747</p>	<p>MoneyGram Express Pay Select Blue Express Paym 4 digit receive code: 203</p> <p>To find nearest moneygr 800-926-9100.</p> <p>MoneyGram Customer S Payment may be made in Please include the follow Oxford Management Ser Claim # Oxfordmg, Melville, NY</p>	<p>Payments by Phone: To use our check by phone service, please call (800) 982-6096</p> <p>*certain restrictions and fees are associated with this services</p>
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Unless you notify this office within 30 days after receiving this notice that you dispute the validity of this debt or any portion thereof, this office will assume this debt is valid. If you notify this office in writing within 30 days from receiving this notice that you dispute the validity of the debt or any portion thereof, this office will obtain verification of the debt or obtain a copy of a judgment, if any, and mail you a copy of such judgment or verification. If you request this office in writing within 30 days after receiving this notice, this office will provide you with the name and address of the original creditor, if different from the current creditor.

WE ARE ACTING AS A DEBT COLLECTOR. THIS LETTER IS AN ATTEMPT TO COLLECT A DEBT AND ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.

We are required under state law to give you the following notices, some of which refer to rights you also have under the federal law. This list does not include a complete list of the rights which consumers or commercial businesses have under state and federal law. Note the following, which may apply in the specified states:

APPLICABLE NOTICE

Colorado	We are required under state law to notify consumers of the following rights. This notice is not a complete list of the rights consumers have under state and federal law. Colorado Residents: If you notify us in writing that you wish us to cease contact by telephone or by mail, then no such further contact by telephone shall be made. If you notify us in writing that you wish us to cease further communication with you, we shall not communicate further with you. We shall not communicate further with you if further efforts are being terminated; (C) if we are unable to locate you; or (D) if we are unable to notify you that we intend to take any action. If you orally inform us of any of the matters specified in this paragraph, you must be made in writing. Collection agencies are licensed by the Colorado Department of Public Safety, 1525 Sherman Street, 5th Floor, Denver, CO 80203. Do not send payments to the Collection Agency Board. For information also see www.go.state.co.us/cob.html .	as not contain a complete list of the rights consumers have under state and federal law.
Idaho	The Agency's licensed address in Idaho is: 3691 N. Robert Way, Meridian, ID 83401. Your phone or your mail.	phone or your mail.
North Carolina	This Collection Agency is licensed by the North Carolina Department of Insurance. Permit #3655	#3655
Massachusetts	We are required under state law to notify consumers of the following rights. This notice is not a complete list of the rights consumers have under state and federal law. Massachusetts residents — NOTICE OF IMPORTANT RIGHTS YOU HAVE THE RIGHT TO MAKE A WRITTEN OR ORAL REQUEST THAT TELEPHONE CALLS REGARDING YOUR DEBT NOT BE MADE TO YOU AT YOUR PLACE OF EMPLOYMENT. ANY SUCH ORAL REQUEST WILL BE VALID FOR ONLY TEN DAYS UNLESS YOU PROVIDE WRITTEN CONFIRMATION OF THE REQUEST POSTMARKED OR DELIVERED WITHIN SEVEN DAYS OF SUCH REQUEST. YOU MAY TERMINATE SUCH REQUEST AT ANY TIME. This Agency's Massachusetts Address: 49 Walnut Street, Weymouth, MA 02188; Phone: (617) 982-6006. Office hours: 8:00 a.m./5:00 p.m. EST, Monday through Friday.	as not contain a complete list of the rights consumers have under state and federal law.
Michigan	Michigan requires us to give the following notice, however, all consumers have these rights under federal law: The liability of a consumer to dispute the validity of a debt shall not be construed as an admission of liability.	liability of a consumer to dispute the validity of a debt shall not be construed as an admission of liability.
Minnesota	This Collection Agency is licensed by the Minnesota Department of Commerce. License #CA-20288093	#CA-20288093
Washington	This Agency's licensed address in Washington is: 512 Bell Street, Edmonds, WA 98020-3177	512 Bell Street, Edmonds, WA 98020-3177
New York City	This Agency is licensed by the New York City Department of Consumer Affairs. Permit #122683	#122683
Utah	As required by Utah law, you are hereby notified that a negative credit report reflecting on your credit obligations may be submitted to a credit reporting agency if you fail to fulfill the terms of your credit obligations.	As required by Utah law, you are hereby notified that a negative credit report reflecting on your credit obligations may be submitted to a credit reporting agency if you fail to fulfill the terms of your credit obligations.
California	Notice: The state Rosenthal Fair Debt Collection Practices Act and the federal Fair Debt Collection Practices Act require that, except under unusual circumstances, collectors may not contact you before 8 a.m. or after 9 p.m. They may not harass you by using threats of violence or arrest or by using obscene language. Collectors may not use false or misleading statements or call you at work if they know or have reason to know that you may not receive personal calls at work. For the most part, collectors may not tell another person, other than your attorney or spouse, about your debt. Collectors may contact another person to confirm your location or to enforce a judgement. For more information about debt collection activities, you may contact the Federal Trade Commission at 1-800-877-FTC-HELP or www.ftc.gov . As required by law, you are hereby notified that a negative credit report reflecting on your credit obligations may be submitted to a credit reporting agency if you fail to fulfill the terms of your credit obligations.	Notice: The state Rosenthal Fair Debt Collection Practices Act and the federal Fair Debt Collection Practices Act require that, except under unusual circumstances, collectors may not contact you before 8 a.m. or after 9 p.m. They may not harass you by using threats of violence or arrest or by using obscene language. Collectors may not use false or misleading statements or call you at work if they know or have reason to know that you may not receive personal calls at work. For the most part, collectors may not tell another person, other than your attorney or spouse, about your debt. Collectors may contact another person to confirm your location or to enforce a judgement. For more information about debt collection activities, you may contact the Federal Trade Commission at 1-800-877-FTC-HELP or www.ftc.gov . As required by law, you are hereby notified that a negative credit report reflecting on your credit obligations may be submitted to a credit reporting agency if you fail to fulfill the terms of your credit obligations.

EXHIBIT B

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

WILLIAM THOMPSON, and
DANIEL SCHULZ,

Plaintiffs,

v.

SALVATORE SPINELLI; and
OXFORD MANAGEMENT
SERVICES, INC.,

Defendants.

040 8224

JUDGE LINN W. PASRAH

MADEIRA L. HIGHTHOLAN

COMPLAINT - CLASS ACTION

INTRODUCTION

1. Plaintiffs bring this action to secure redress against unlawful credit and collection practices engaged in by defendants Salvatore Spinelli ("Spinelli"), Oxford Collection Agency, Inc. ("Oxford"), and Oxford Management Services, Inc. ("OMP"). Plaintiffs allege violation of the Fair Debt Collection Practices Act, 15 U.S.C. §1692 et seq. ("FDCPA").

JURISDICTION AND VENUE

2. This Court has jurisdiction under 28 U.S.C. §§1331 and 1337, and 15 U.S.C. §1692k (FDCPA).

3. Venue and personal jurisdiction in this District is proper because: a) Defendants transact business here, and b) Defendant's collection communications to plaintiffs and others were transmitted into the District.

PARTIES

4. Plaintiff William Thompson ("Thompson") is an individual who currently resides in Elkhart, Indiana. At the time his cause of action arose, Thompson resided in Chicago, IL.

5. Plaintiff Daniel Schultz ("Schultz") is an individual who resides in Aurora, Illinois.

6. Defendant Salvatore Spinelli ("Spinelli") is an attorney. He is a debt collector

subject to the FDCPA. He may be found at 135 Maxess Road, Suite 2B, Melville, NY 11747.

7. Defendant Oxford Management Services, Inc. ("Oxford") is a corporation with its principal place of business located at 135 Maxess Road, Suite 2B, Melville, NY 11747. Salvatore Spinelli, Esq., 135 Maxess Road, Melville, NY 11747, is listed by the New York Department of State, Division of Corporations, as the person designated to officially receive process for Oxford. Oxford operates a collection agency. It is a debt collector subject to the FDCPA. It does business in Illinois.

THOMPSON FACTS

8. On or about March 30, 2004, plaintiff Thompson was sent, via U.S. Mail, in Illinois, the collection letter attached as Exhibit A, seeking to collect a debt incurred for personal, family or household purposes. He received it a few days later.

9. Exhibit A is a form letter.

10. On or about April 6, 2004, Thompson was sent the letter attached as Exhibit B, in Illinois, seeking to collect the same debt. He received it a few days later.

11. Exhibit B is a form letter.

12. The consecutive code numbers, PKG5-17 and PKG5-7, in the lower right corner of Exhibits A and B are form designations.

13. Exhibits A and B each request an \$8.00 credit card "processing fee."

SCHULZ FACTS

14. On or about April 14, 2004, Oxford sent Exhibit C to plaintiff Schulz. Exhibit C is a collection letter seeking to collect a debt incurred for personal, family or household purposes. Plaintiff received it a few days later.

15. On or about May 17, 2004, Oxford sent Exhibit D to plaintiff Schulz. Exhibit D is a collection letter seeking to collect a debt incurred for personal, family or household purposes. Plaintiff received it a few days later.

16. On or about June 28, 2004, Oxford sent Exhibit E to plaintiff. Exhibit E is

a collection letter seeking to collect a debt incurred for personal, family or household purposes. Plaintiff received it a few days later.

17. Exhibits C, D, and E are form letters. They have consecutive form designation numbers: PKG1-154, PKG1-155, and PKG1-156.

18. Exhibits D, E and F each request an \$8.00 credit card "processing fee."

VIOLATION ALLEGED

19. Spinelli and Oxford violated the FDCPA with respect to Exhibits A through E.

20. It is a violation of the FDCPA for a debt collector to request that a debtor pay an \$8.00 processing fee in Illinois where the underlying contract does not provide for such fee.

21. The FDCPA prohibits "[t]he collection of any amount (including any interest, fee, charge, or expense incidental to the principal obligation) unless such amount is expressly authorized by the agreement creating the debt or permitted by law". 15 U.S.C. §1692f(1).

22. This means that "A debt collector may attempt to collect a fee or charge in addition to the debt if either (a) the charge is expressly provided for in the contract creating the debt and the charge is not prohibited by state law, or (b) the contract is silent but the charge is otherwise expressly permitted by state law. Conversely, a debt collector may not collect an additional amount if either (a) state law expressly prohibits collection of the amount, or (b) the contract does not provide for collection of the amount and state law is silent." Federal Trade Commission Staff Commentary on the Fair Debt Collection Practices Act, 53 Fed.Reg. 50,097 at 50,108 (Dec. 13, 1988).

23. The credit card processing fee is not authorized by the contract creating the debt, nor by a statute or regulation authorizing the charge even in the absence of a contract.

24. In fact, the Illinois Collection Agency Act, 225 ILCS 425/9(a)(29), specifically makes unlawful:

Collecting or attempting to collect any interest or other charge or fee in excess of the actual debt or claim unless such interest or other charge or fee is expressly authorized

by the agreement creating the debt or claim unless expressly authorized by law or unless in a commercial transaction such interest or other charge or fee is expressly authorized in a subsequent agreement.

25. The FDCPA §1692e provides:

§ 1692e. False or misleading representations [Section 807 of P.L.]

A debt collector may not use any false, deceptive, or misleading representation or means in connection with the collection of any debt. Without limiting the general application of the foregoing, the following conduct is a violation of this section: . . .

(2) The false representation of--

(A) the character, amount, or legal status of any debt; or

(B) any services rendered or compensation which may be lawfully received by any debt collector for the collection of a debt. . . .

(5) The threat to take any action that cannot legally be taken or that is not intended to be taken. . . .

(10) The use of any false representation or deceptive means to collect or attempt to collect any debt or to obtain information concerning a consumer. . . .

26. Sections 1692f and 1692f(1) provide:

§ 1692f. Unfair practices [Section 808 of P.L.]

A debt collector may not use unfair or unconscionable means to collect or attempt to collect any debt. Without limiting the general application of the foregoing, the following conduct is a violation of this section:

(1) The collection of any amount (including any interest, fee, charge, or expense incidental to the principal obligation) unless such amount is expressly authorized by the agreement creating the debt or permitted by law. . . .

CLASS ALLEGATIONS

27. Plaintiffs bring this action on behalf of a class. The class consists of (a) all natural persons, wherever located (b) who were sent a Spinelli or Oxford letter referring to a credit card payment processing fee, (c) which letter was sent on or after a date one year prior to the filing of this action and anytime after the filing of this action.

28. The class members are so numerous that joinder is impracticable. On

information and belief, there are more than 50 members.


29. There are questions of law and fact common to the class members, which common questions predominate over any questions that affect only individual class members. The predominant common question is whether the credit card processing fee violates the FDCPA.

30. Plaintiffs will fairly and adequately represent the interests of the class members. Plaintiffs have retained counsel experienced in consumer credit and debt collection abuse cases.

31. A class action is an appropriate means of adjudicating this dispute. Individual cases are not economically feasible.

WHEREFORE, plaintiffs request that the Court enter judgment in favor of plaintiffs and the class members and against defendants for:

- a. Statutory damages (\$1,000 to each plaintiff and the lesser of \$500,000 or 1% of net worth for the class) against each defendant;
- b. Actual damages equal to all credit card processing fees collected;
- c. Attorney's fees, litigation expenses and costs of suit;
- d. Such other or further relief as the Court deems proper.



Daniel A. Edelman

Daniel A. Edelman
Cathleen M. Combs
James O. Lattuner
Alexander H. Burke
EDELMAN, COMBS, LATTURNER
& GOODWIN, L.L.C.
120 S. LaSalle Street, 18th Floor
Chicago, Illinois 60603
(312) 739-4200
(312) 419-0379 (FAX)

JURY DEMAND

Plaintiffs demand trial by jury.



Daniel A. Edelman

J:\Case\spinelli-thompson\2.750\pleading\consol cmplt.wpd

EXHIBIT A

135 Maxess Road, Suite 2B
Melville, NY 11747

Salvatore Spinelli, Esq.
Attorney At Law
(800)982-6586 FAX (631)454-4509

March 30, 2004

3230122-17
WILLIAM THOMPSON
712 N SPAULDING AVE APT 2 APT 2
CHICAGO, IL 60624

RE: CROSS COUNTRY BANK
ACCOUNT #: **Redacted**
CLAIM #: 3230122
AMOUNT: \$2826.62

Dear WILLIAM THOMPSON:

As you have chosen to ignore our previous correspondence, we are left with no alternative but to recommend to our client the commencing of a lawsuit in order to protect their financial interest.

If we do not hear from you in the next five (5) days, be advised we will so recommend said lawsuit. This letter is an attempt to collect a debt, and any information obtained will be used for that purpose. This communication is from a debt collector.

Sincerely,


Salvatore Spinelli, Esq.

PKGS-17

(Detach Here)

RE: CROSS COUNTRY BANK
ACCOUNT #: **Redacted**
CLAIM #: 3230122
AMOUNT: \$2826.62

A \$20.00 bank fee will be applied to your account for any dishonored check deposited in accordance with New York State law.

Credit Card Payment Information

[] [] [] [] [] [] [] []

Account Number: _____
Expiration Date: _____
Amount to be Applied to Card: \$ _____
Cardholder Signature: (Print Name Below Line) _____

Salvatore Spinelli, Esq.
Attorney At Law
135 Maxess Road, Suite 2B
Melville, NY 11747

* An \$8.00 processing fee is charged to all credit card payments.

PKGS-17
010017

135 Maxess Road, Suite 2B
Melville, NY 11747

Salvatore Spinelli, Esq.
Attorney At Law
(800)982-6586 FAX (631)454-4509

April 6, 2004

3230122-7
WILLIAM THOMPSON
712 N SPAULDING AVE APT 2 APT 2
CHICAGO, IL 60624

RE: CROSS COUNTRY BANK
ACCOUNT #: **Redacted**
CLAIM #: 3230122
AMOUNT: \$2826.62

Dear WILLIAM THOMPSON:

Since all previous attempts to resolve the above captioned matter have failed, this firm has been retained by the above named client to assist in the collection of this debt.

Our objective is to resolve this in a swift and amicable fashion. If you do not contact this office, we will advise our client of all avenues open to them to collect this indebtedness. This letter is an attempt to collect a debt, and any information obtained will be used for that purpose. This communication is from a debt collector.

Very truly yours,



Salvatore Spinelli, Esq.

PKG5-7

(Detach Here)

RE: CROSS COUNTRY BANK
ACCOUNT #: **Redacted**
CLAIM #: 3230122
AMOUNT: \$2826.62

A \$20.00 bank fee will be applied to your account for any dishonored check deposited in accordance with New York State law.

Credit Card Payment Information



Account Number: _____

Expiration Date: _____

Amount to be Applied to Card: \$ _____

Cardholder Signature: (Print Name Below Line)

Salvatore Spinelli, Esq.
Attorney At Law
135 Maxess Road, Suite 2B
Melville, NY 11747

EXHIBIT C

CS 9018
Melville, NY 11747

April 14, 2004

3763151-154
DANIEL SCHULZ
2030 LILAC LANE APT 4
AURORA, IL 60506

MasterCard/Visa Credit Card Payment Information

[] [] [] [] [] []
Account Number: _____
Expiration Date: _____ Amount: \$ _____
Cardholder Signature: _____
Print Name: _____

* An \$8.00 processing fee is charged to all credit card payments.

RE: PCDI
Account #:
Claim #: 3763151
Amount: \$588.00

REDACTED

PCDI
P.O. Box 1584
Melville, NY 11747

A \$20.00 bank fee will be applied to your account for any dishonored check deposited in accordance with New York State law.

PKG1-154

RE: PCDI
Account #:
Claim #: 3763151
Amount: \$588.00

REDACTED

Dear DANIEL SCHULZ:

Our office has been retained by the above named client to collect on an overdue account. This letter serves as an attempt to collect a debt, and any information obtained will be used for that purpose. This communication is from a debt collector.

Unless you notify this office within 30 days after receiving this notice that you dispute the validity of the debt or any portion thereof, this office will assume this debt is valid. If you notify this office in writing within 30 days from receiving this notice, this office will obtain verification of the debt or obtain a copy of a judgment and mail you a copy of such judgment or verification. If you request this office in writing within 30 days after receiving this notice, this office will provide you with the name and address of the original creditor, if different from the current creditor.

This is an opportunity for you to resolve this debt. If this matter has been overlooked, please be aware that it is still legally owed. When you enrolled in your course, you signed an agreement which stated you would be responsible for the tuition, or a portion thereof. Payment via check by phone, certified funds, credit card in full will, or funds transfer cease all collection activity.

In order to ensure proper crediting and handling of your account, payment must be made payable to the above named client and must be remitted to this office.

Sincerely,

Robert Spencer

Robert Spencer
Collection Manager



Oxford Management Services™

CS 9018, Melville, NY 11747 (800)722-0248 Fax: (570)876-6983



AMERICAN COLLECTORS
association member



International Association
of Commercial Collectors Inc.

PKG1-154
C10154

EXHIBIT D

CS 9018
Melville, NY 11747

May 17, 2004

3763151-155
DANIEL SCHULZ
2030 LILAC LANE APT 4
AURORA, IL 60506

MasterCard/Visa Credit Card Payment Information

[] [] [] []
Account Number: _____
Expiration Date: _____ Amount: \$ _____
Cardholder Signature: _____
Print Name: _____

* An \$8.00 processing fee is charged to all credit card payments.

RE: PCDI
Account #:
Claim #: 3763151
Amount: \$588.00 **REDACTED**

PCDI
P.O. Box 1584
Melville, NY 11747

A \$20.00 bank fee will be applied to your account for any dishonored
check deposited in accordance with New York State law.

PKG2-155

RE: PCDI
Account #:
Claim #: 3763151
Amount: \$588.00 **REDACTED**

Dear DANIEL SCHULZ:

You have not responded to our initial communications in which we advised that you are indebted to our client in the above amount. We must assume, therefore, that you have no intention of amicably resolving this matter, and accordingly, demand that you promptly remit Payment in Full. Your immediate attention will prevent this office from escalating its collection efforts against this debt.

Be advised, this letter is an attempt to collect a debt, and any information obtained by this office will be used for that purpose. This communication is from a debt collector.

Sincerely,

Peter A Brooks

Peter A. Brooks
Senior Collection Manager



Oxford Management Services™

CS 9018, Melville, NY 11747 (570)876-6580 Fax: (570)876-6983



AMERICAN COLLECTORS
association member



International Association
of Commercial Collectors, Inc.

PKG2-155
C10155

EXHIBIT E

PKG3-156
C10156